

Message

From: Imhoff, Robert [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D6A9EDBA36924D23AFCBE0B110FAA0CB-IMHOFF, ROB]
Sent: 7/8/2020 6:15:28 PM
To: Wilson, Aimee [Wilson.Aimee@epa.gov]
Subject: RE: Review requested by 7/6: Revisit Notice covering TX

Thanks for your help getting the voided operating permit information for the Sandow facility today!

From: Imhoff, Robert
Sent: Wednesday, July 8, 2020 6:31 AM
To: Wilson, Aimee <Wilson.Aimee@epa.gov>
Subject: RE: Review requested by 7/6: Revisit Notice covering TX

Good morning!

We are writing a redesignation for Milam County from Unclassifiable to Attainment/Unclassifiable for SO₂. One part of that is the voiding of permits for Sandow.

This is similar to what you gave us for Big Brown and Monticello for a clean data determination. I pasted the text for Big Brown's permits in the CDD below to give you an idea of what we're needing:

In the Freestone and Anderson Counties area, Big Brown Steam Electric Station ("Big Brown") was the largest source of SO₂ emissions in the area, but recently and permanently suspended operations as of January 2018, and the majority of its New Source Review (NSR) permits were voided on March 29, 2018, and its operating permit was voided August 3, 2018. In Titus County, Monticello Steam Electric Station ("Monticello") was the largest source of SO₂ emissions in the area, but recently and permanently suspended operations as of February 2018 and the majority of its NSR permits were voided on February 14, 2018 and its operating permit was voided on August 3, 2018. Both facilities are owned by Vistra Energy Corp and its subsidiary Luminant ("Vistra Energy").

As discussed above, for the SO₂ designations in the two Texas areas addressed in this action, the EPA relied on modeling that demonstrated that the Big Brown and Monticello plants were the key contributors to the modeled 2010 SO₂ NAAQS violations.

An important factor demonstrating attainment in the two areas is the retirement of the two Vistra Energy facilities. Regarding the Anderson and Freestone Counties area, Vistra Energy permanently retired the BBSES coal-fired steam electric generating Units 1 and 2 on February 12, 2018. Vistra Energy filed to void the Big Brown Title V permit, FOP 065, on 5/24/2018 and it was voided by TCEQ on 8/29/2018. A letter was submitted by Vistra Energy to TCEQ to void individual NSR permits (17891, 18744, 45420, 53205, 54810, 56445, 56447, 83646, 83647, 85296, 94619, 95214, 96276, 99047, 99050, 106862, 108990, 112207, and 148918) On March 29, 2018, TCEQ cancelled all new source review authorizations for BBSES Units 1 and 2 and certain other facilities, as requested by Vistra Energy. The remaining permits (17891, 18744, 56447, 106862, and 112207) are material handling permits maintained while closure activities are completed, such as coal piles, silos, and conveyors.

From: Wilson, Aimee <Wilson.Aimee@epa.gov>
Sent: Wednesday, July 8, 2020 6:26 AM
To: Imhoff, Robert <imhoff.robert@epa.gov>
Subject: RE: Review requested by 7/6: Revisit Notice covering TX

Bob,

What exactly are you needing? I wasn't sure from the email.

Thanks,
Aimee

From: Imhoff, Robert <imhoff.robert@epa.gov>
Sent: Wednesday, July 08, 2020 6:22 AM
To: Feldman, Michael <Feldman.Michael@epa.gov>; Keas, Ashley <keas.ashley@epa.gov>; Mocka, Corey <mocka.corey@epa.gov>
Cc: Wilson, Aimee <Wilson.Aimee@epa.gov>
Subject: RE: Review requested by 7/6: Revisit Notice covering TX

Michael,

I was able to pull the voiding of their Title V permits on 7/19/18 and 10/8/18. I don't see their permit numbers anywhere though – copying Aimee for her help.

-Bob

Air Permitting Actions for:

county: MILAM

project type: RENEWAL

permit type: Any

project status: ALL

order by: proj_num

Click on the Project Number to see details about that permit application.

Program Area	Permit Number	Permit Type	Permit Status	Project Number	Customer Name	Legal Name	CN Number	Account Number	Project type	TCEQ Received Date	Project Complete Date	Permit Issuance Date	Renewal Date	Project Status	Project
FOP	54	SOP	VOID	4267	TXU GENERATION COMPANY LP	TXU Generation Company LP	CN600135511	MM0023J	RENEWAL APPLICATION	11/29/02	11/02/04	07/19/18	03/12/15	COMPLETE	SA ST EL ST
FOP	54	SOP	VOID	13722	LUMINANT GENERATION COMPANY LLC	Luminant Generation Company LLC	CN603256413	MM0023J	RENEWAL APPLICATION	05/01/09	03/12/10	07/19/18	03/12/15	COMPLETE	SA ST EL ST
FOP	54	SOP	VOID	21871	LUMINANT GENERATION COMPANY LLC	Luminant Generation Company LLC	CN603256413	MM0023J	RENEWAL APPLICATION	09/12/14	07/19/18	07/19/18	03/12/15	VOID	SA ST EL ST

FOP	3025	SOP	VOID	24193	LUMINANT GENERATION COMPANY LLC	Luminant Generation Company LLC	CN603256413	MMA003C	RENEWAL APPLICATION	02/18/16	10/08/18	10/08/18	08/18/16	VOID	SA GE PL
FOP	2989	GOP	EFFECTIVE	25493	MINE SERVICE INC	Mine Service, Inc.	CN605139781	960220S	RENEWAL APPLICATION	11/03/16	03/17/17	03/17/17	03/17/22	COMPLETE	PH BL MO SE 120

From: Feldman, Michael <Feldman.Michael@epa.gov>

Sent: Tuesday, July 7, 2020 4:23 PM

To: Keas, Ashley <keas.ashley@epa.gov>; Mocka, Corey <mocka.corey@epa.gov>; Imhoff, Robert <imhoff.robert@epa.gov>

Subject: RE: Review requested by 7/6: Revisit Notice covering TX

We should be able to share documentation that the permit has been permanently pulled. I know we have that for the other facilities they shutdown.

Bob – can you check with Aimee to get the documentation.

Redacted

Redacted

Cc: Feldman, Michael <Feldman.Michael@epa.gov>; Mocka, Corey <mocka.corey@epa.gov>

Subject: RE: Review requested by 7/6: Revisit Notice covering TX

Hi Ashley,

Sorry for the delay on my review – we live in interesting times! I've attached a markup of your draft incorporating Texas' request for redesignation of Milam County. I didn't have any other comments.

Let me know if you have any questions.

-Bob

From: Keas, Ashley <keas.ashley@epa.gov>

Sent: Tuesday, July 7, 2020 11:23 AM

To: Imhoff, Robert <imhoff.robert@epa.gov>

Cc: Feldman, Michael <Feldman.Michael@epa.gov>; Mocka, Corey <mocka.corey@epa.gov>

Subject: FW: Review requested by 7/6: Revisit Notice covering TX

Hi Bob,

Just checking in to see whether you've had a chance to review the draft notice I sent over to you that covers Milam county. Note since we received the letter from Texas for this area after I sent this draft to you, I've updated that in my own working version and you can disregard my comments in there about that. I hope to turn this around for AQAD and OGC review this week since we still wish to propose this in early to mid-August. Let me know if you have any comments or concerns or would like to have a short discussion about your feedback.

Thanks,

Ashley Keas, P.E.

U.S. EPA - Office of Air Quality Planning and Standards

Air Quality Policy Division

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109 TW Alexander Drive (C539-04)

Research Triangle Park, NC 27711

(919) 541-2041

keas.ashley@epa.gov

From: Keas, Ashley

Sent: Friday, June 26, 2020 12:59 PM

To: Imhoff, Robert <imhoff.robert@epa.gov>

Cc: Mocka, Corey <mocka.corey@epa.gov>; Uher, Thomas <uher.thomas@epa.gov>

Subject: Review requested by 7/6: Revisit Notice covering TX

Hello Bob,

I have a draft of the round 2 unclassifiable area revisit notice ready to share with you for review. Please take a look at this draft notice particularly the section covering Texas. If possible, can you get consolidated comments to me by COB 7/6? I realize it's a holiday week, so if you need more time just let me know. I'll be sharing this with Regions 5 and 7 concurrently as well for their respective sections. And like we mentioned before, the goal is still to propose this concurrently to the Round 4 intended designations in mid-August.

Our direction for this consolidated notice was to keep it high-level and basically just present the now complete attaining monitoring data as support for this action without the need for a separate TSD.

Also note this is currently written assuming we don't receive Texas' redesignation request prior to proposal but that can easily be revised if we do get it early enough. I also haven't included any language about the Sandow shutdown but if you think it makes sense to also include something on that, I'm open to suggestions on it.

Thanks!

Ashley Keas, P.E.
U.S. EPA - Office of Air Quality Planning and Standards
Air Quality Policy Division
Geographic Strategies Group
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